

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Missouri

**In the Matter of the Search of** )  
 the Priority Mail Express 1-Day parcel bearing tracking )  
 number 9470 1092 0556 8533 9937 69 addressed to: ) Case No. 4:21 MJ 1084 (JMB)  
 "ALONDRA GARCIA 6475 ATLANTIC AVE SPC 226 )  
 LONG BEACH CA 90805-8618" with a return address of ) SUBMITTED TO THE COURT AND  
 "Joy!Gifts & Wholesale PO Box 872 Cape Girardeau MO ) SIGNED BY RELIABLE ELECTRONIC MEANS  
 63702-0872."

## APPLICATION FOR A SEARCH WARRANT

I, MASON J McNAIL, a federal law enforcement officer or an attorney for the government request a search warrant and state under penalty of perjury that I have reason to believe that on the following property: **the Priority Mail Express 1-Day parcel bearing tracking number 9470 1092 0556 8533 9937 69 addressed to: "ALONDRA GARCIA 6475 ATLANTIC AVE SPC 226 LONG BEACH CA 90805-8618" with a return address of "Joy!Gifts & Wholesale PO Box 872 Cape Girardeau MO 63702-0872,"**

located in the EASTERN District of MISSOURI, there is now concealed

controlled substances and/or United States currency.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*

*Offense Description*

Title 21, U.S.C., §§ 846, 841(a)(1)

Conspiracy to possess with intent to distribute controlled substance(s)

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

**I state under the penalty of perjury that the foregoing is true and correct.**

Mason J McNail, Task Force Officer  
United States Postal Inspection Service  
*Printed name and title*

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41.

Date: March 11, 2021

City and State: St. Louis, MO

*Judge's signature*

John M. Bodenhausen, U.S. Magistrate Judge  
*Printed name and title*

AUSA: PAUL D'AGROSA

AFFIDAVIT

I, Mason J McNail, being duly sworn, state the following:

1. I am a Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS). I have been assigned as a Task Force Officer with USPIS for approximately 19 months. I have been assigned to the Contraband Interdiction and Investigation (CI2) Team. I have completed available training by the USPIS in the investigation of controlled substances or proceeds/payments being transported through the United States. The St. Louis Field Office's CI2 Team has intercepted numerous parcels which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity. I have accrued approximately 22 years of law enforcement experience. During my career, I have conducted numerous narcotics investigations as a Narcotics Detective, a position in which I have approximately nine years of experience, to include an assignment with the Drug Enforcement Administration (DEA). While assigned as a Detective, I received extensive training in narcotics investigations and money laundering investigations.

2. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail - two day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business-to-business, correspondence. Intelligence from prior packages, which were found to contain controlled substances or proceeds/payments, has indicated that these labels are usually from an individual to an individual. Express Mail and Priority Mail are seldom used for individual to individual correspondence.

3. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express and United Parcel Service, are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of Federal Express and United Parcel Service are similar to U.S. Postal Service Express Mail and Priority Mail. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service are favored because of the speed, reliability, free telephone and internet package tracking service, as well as



the perceived minimal chance of detection. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service were originally intended for urgent, business-to-business, correspondence. However, intelligence from prior packages which were found to contain controlled substances or proceeds/payments, has indicated that these shipping labels are usually from an individual to an individual. Federal Express and United Parcel Service are seldom utilized to convey individual-to-individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight or two to three day delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of, and destinations for, controlled substances. The USPIS conducted an analysis of prior packages mailed through overnight and/or two to three day delivery services that contained controlled substances or proceeds/payments of controlled substance sales. The analysis of those prior packages indicated that these labels are usually from an individual to an individual. In the few cases when overnight, and or two to three day delivery service packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company, or the business listed is not associated with the mailer and was randomly selected by the mailer to deter law enforcement detection. In such instances, Postal Inspectors review available business records to verify the postage payment utilized by the mailer.

5. Most business mailings sent via USPS or through other private couriers reflect a pre-established postage meter or other various lines of credit to pay for the postage. Additionally, during the Silk Road investigation (dark web investigation that provided avenues to customers to order narcotics via the internet) the USPIS learned that unknown persons posted intelligence on the Silk Road website warning would be drug mailers that most USPIS search warrant affidavits for narcotics/narcotics proceeds packages, reflect mailing labels written as person-to-person and bore fictitious addressee and sender names. Due to the posting on the Silk Road Website, USPIS has noticed an increased number of packages utilizing valid sender and addressee names and or valid business names on narcotics/narcotics proceeds packages. Recent analysis has also shown that whether the mailer utilized a legitimate name/business on a mailing label or a fictitious name on the mailing label, cash payment for postage is the method of payment for most narcotics/narcotics proceeds parcels. USPIS analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package

will contain a controlled substance or the proceeds of controlled substance sales. Information collected by the USPS has demonstrated that the presence of these characteristics is significant for delivery services, to include U.S. Postal Service Express Mail, U.S. Postal Service Priority Mail, Federal Express, and United Parcel Service. This profile includes the following characteristics: package mailed from or addressed to a narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed from a Commercial Mail Receiving Agency (CMRA); package is addressed to residential areas; package is addressed from an individual to an individual; packages are wrapped in brown paper and/or heavily taped; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address, and or any other characteristic previously noted in this paragraph.

6. The U.S. Postal Inspection Service St. Louis Field Office's CI2 Team has found the characteristics listed in paragraphs three, four, and five, are indicative of packages, which have been found to contain illegal controlled substances or the proceeds/payments for controlled substances.

7. This affidavit is submitted for the limited purpose of establishing probable cause for the search warrant sought. I have not set forth each and every fact known to me concerning this investigation. I have included what I believe are facts sufficient for the present purpose. The information contained in this affidavit is based upon my personal knowledge and investigation, as well as information conveyed to me by other law enforcement agents and employees.

8. On Tuesday, March 9, 2021, I conducted a review of parcels at the Main Post Office (MPO), 1720 Market Street, St. Louis, MO 63155. Parcel **9470 1092 0556 8533 9937 69** (hereafter "**Subject Parcel 1**"), described as a Priority Main Express parcel, was located. **Subject Parcel 1** was mailed on March 9, 2021 utilizing Pitney Bowes as a mailer. I noted **Subject Parcel 1** was addressed to a known source narcotic area: Marina Del Ray, CA; smelled of marijuana and fragrance similar to dryer sheets; and "waiver of signature" was printed on the Priority Mail Express Label. The "waiver of signature" allows the parcel to be delivered without the addressee or the addressee's agent having to sign for the parcel, contingent upon the parcel being left in a secure location at the address. This can allow the package's delivery to be tracked without affirmative acceptance by an individual who may be being investigated by law enforcement. The



characteristics listed in this paragraph are consistent with characteristics of previous parcels that have contained narcotics or the proceeds of narcotics. Due to the characteristics of **Subject Parcel 1**, I detained **Subject Parcel 1** for further review in order to verify the validity of the addressee and sender listed on the mailing label. See Attachment A, incorporated by reference, which is a photo of the mailing label of **Subject Parcel 1**.

9. **Subject Parcel 1** was addressed to “ALONDRA GARCIA 6475 ATLANTIC AVE SPC 226 LONG BEACH CA 90805-8618.” **Subject Parcel 1** was addressed from “Joy!Gifts & Wholesale PO Box 872 Cape Girardeau MO 63702-0872” A search of available law enforcement databases and USPS records indicated the sender’s PO Box belonged to Austin Venable, 1414 Douglas Drive, Jackson, MO 63755. A recent previous investigation, based on an influx of parcels originating in California and destined for the PO Box, has discovered that Austin Venable receives mail at 3 Village Drive, Apt 105, Cape Girardeau, MO 63701. An online search of the Missouri Secretary of State business directory does not indicate “Joy! Gifts & Wholesale” is a currently valid, registered business with the State of Missouri. Austin Venable previously received a Priority Mail Express Parcel (EJ422207762US) addressed from Austin Venable 1414 Douglas Drive, Jackson, MO 63755 and addressed to Austin Venable, 3 Village Drive Unit 105, Cape Girardeau, MO 63701 with total shipping of \$130.75 on September 24, 2020. USPS business records indicate the parcel was actually presented to the USPS Post Office in Burlingame, CA (94010). Austin Venable also previously received a Priority Mail Express Parcel (EE405578009US) from “Chrome Beauty’s 72 Agostino, Irvine, CA 92614 on January 27, 2021.

10. A search of available law enforcement databases and USPS records indicate the recipient’s address was associated with a seizure of methamphetamine in 2018 in a parcel originating from “6475 Atlantic SPC 226, Long Beach, CA 90805” to North Dakota. Alondra Garcia last reported to the address on April 2, 2020, and currently reports to 226 Orchid Lane, Long Beach, California, which your affiant was unable to verify as a physical address at this time. Due to the characteristics associated with **Subject Parcel 1**, a K-9 review was requested.

11. On March 9, 2021, I utilized my narcotics certified canine “Tobi.” **Subject Parcel 1** was placed in an area not known to have been previously contaminated by a narcotic odor. I directed “Tobi” to search the area. Upon arriving at **Subject Parcel 1**, canine “Tobi” reacted in a positive manner, indicating the presence of a narcotic odor. Attached hereto and incorporated by reference is Attachment B, containing Tobi’s qualifications.

12. **Subject Parcel 1** is a Priority Mail Express USPS branded white padded envelope. **Subject Parcel 1** measures approximately 9 1/2 inches by 11 inches, and weighs approximately 1 pounds, 7 ounces. Based on my training and experience, as well as the training and experience of other members of the USPIS Saint Louis CI2 Team, I know that the size and weight of **Subject Parcel 1**, coupled with other indicators (the smell of marijuana emanating from the parcel, fictitious information handwritten on the label, and a positive reaction by a narcotic trained canine), are indicative of other packages which have been found in the past to contain narcotic substances, or monies which are the proceeds/payments of narcotic trafficking. It is my belief that the package will contain narcotics, a violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18 United States Code 1716, non-mailable articles, which are often posted inside of U.S. Post Offices and include contraband that could pose a danger to life, health, or property. Upon execution of the search warrant, I will provide the court with documentation of my findings. It is my belief that the package will contain narcotics, a violation of Title 21, United States Code, Sections 841(a)(1) and 846 and/or Title 18, United States Code, Section 1716

13. In consultation with the United States Attorney's Office, I have learned that:

a. Title 18, United States Code, Section 1956(a)(1)(A)(i) criminalizes conducting a transaction, including transferring, delivering, or other disposition, knowing that such transaction represents the proceeds of some form of unlawful activity and that in fact involves the proceeds of a specified unlawful activity, including violations of the Controlled Substances Act, with the intent to promote the carrying on of the specified unlawful activity.

b. Title 18, United States Code, Section 1956(a)(1)(B) criminalizes conducting a transaction, including transfer, delivery, or other disposition, knowing that such transaction represents the proceeds of some form of unlawful activity and that in fact involves the proceeds of a specified unlawful activity, including violations of the Controlled Substances Act, knowing that the transaction is designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity.

c. Title 18, United States Code, Section 1952 criminalizes using the mail with the intent to distribute the proceeds of any unlawful activity, including a business enterprise involving controlled substances, or otherwise promoting, managing, establishing, carry on, or facilitating the promotion, management, establishment, or carrying on, of such unlawful activity.



14. Based upon training and experience, and in consultation with other law enforcement officers and prosecutors, I am aware that individuals engaged in illegal activities (i.e., drug trafficking) that generate significant cash proceeds frequently engage in further criminal activities in order to conceal the source of the cash proceeds. In conjunction with that effort, these individuals avoid banking institutions, which are subject to federal reporting requirements mandating that a written report be made of any transaction involving \$10,000 or more in cash. Wire transfer services (i.e. Western Union and MoneyGram) are also subject to such reporting requirements. In an effort to evade these reporting requirements, individuals engaged in criminal activity seek alternate means (i.e. personal couriers, the United States Mail, and/or private delivery services like FedEx) to transport cash.

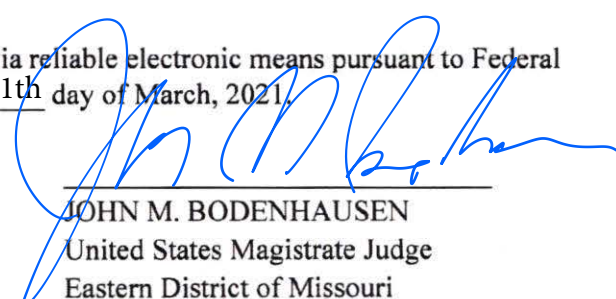
15. **Subject Parcel 1** is currently in the custody of Task Force Officer Mason J McNail in the Eastern District of Missouri.

16. Because this investigation is ongoing, and its success would be jeopardized if the contents of this affidavit were made public, Inspectors request that this affidavit be sealed until further order of the Court.

**I state under penalty of perjury that the foregoing is true and correct.**

  
MASON J MCNAIL  
USPIS Task Force Officer

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this 11th day of March, 2021.

  
JOHN M. BODENHAUSEN  
United States Magistrate Judge  
Eastern District of Missouri



# ATTACHMENT A



US POSTAGE  
03/09/2021  
From 63702



Pitney Bowes 026W0004898001  
ComPlsPrice  
Padded FR Env 3001205956

Zone 7

## PRIORITY MAIL EXPRESS 1-DAY™

Scheduled Delivery Date: 03/10/2021

Joy! Gifts & Wholesale  
PO Box 872  
Cape Girardeau MO 63702-0872

0007

WAIVER OF SIGNATURE

C025

ALONDRA GARCIA  
6475 ATLANTIC AVE SPC 226  
LONG BEACH CA 90805-8618

USPS TRACKING #



9470 1092 0556 8533 9937 69

NONPICKUP



Package Pic  
code

OF  
MY WE



# **ATTACHMENT B**

**North County Police Cooperative**  
Bureau of Criminal Investigations Canine Detective  
Canine Probable Cause Affidavit of Qualifications  
Handler: Detective Mason McNail, DSN 373  
Canine "Tobi"

I, Detective Mason McNail, DSN 464, have been a Commissioned Police Officer with the North County Police Cooperative since January of 2021. I have previously amassed 22 years of police and narcotics experience. I have completed 960 hours of Missouri P.O.S.T. required Law Enforcement Academy requirements. Canine "Tobi" and I are currently assigned to the North County Police Cooperative Bureau of Criminal Investigations, as well as the United States Postal Inspection Service.

Canine Tobi is a brindle colored, male, Dutch Shepherd. He was born on June 10, 2018. Canine Tobi and I attended and completed the "Narcotics Detection," from August 2, 2020 through August 14, 2020. This course was held at F.M. K9, located in Berrien Center, Michigan. The training course consisted of two weeks of instruction in the application of canine obedience, narcotics/controlled substance detection, and article search. Canine Tobi and I were certified by the North American Police Work Dog Association (NAPWDA) as an accredited Narcotic Detection Canine team on August 12, 2020.

Canine Tobi has been trained to sniff and alert to the distinctive odors of controlled substances including: Heroin, Cocaine, Methamphetamine, Fentanyl, and Marijuana. Canine Tobi alerts to these odors in a passive manner and exhibits a significant change in behavior by sitting, standing, or laying at, or as close as he can get, to the source of the odor.

Since Canine Tobi and I began working, he has been responsible for the seizure of approximately 10.5 pounds of marijuana, approximately 24 pounds of methamphetamine, and approximately 2.8 grams of LSD. Canine Tobi has also been responsible for the seizure of approximately \$47,811 in smuggled bulk US Currency.

Canine Tobi and I train a minimum of 16 hours per month, in the areas of narcotic detection, obedience, tracking, and article searches with the St. Louis County Police Department and/or on our own time.

This affidavit is current as of January 12, 2021.

Detective Mason McNail, DSN 373  
North County Police Cooperative  
Bureau of Criminal Investigations  
8027 Page  
St. Louis, MO  
314-427-8000